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8 *Attorneys for Plaintiffs and*  
9 *the Class Members*

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11 **UNITED STATES DISTRICT COURT FOR**  
12 **THE NORTHERN DISTRICT OF CALIFORNIA**  
13

14 Chelsea, LLC, Mark Russo, Allen Loretz, and  
15 Ivan Simpson, individually and on  
behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 Regal Stone, Ltd., Hanjin Shipping, Co., Ltd.,  
19 Conti Cairo KG, NSB Neiderelbe, Synergy  
Maritime, Ltd. *In Personam*; M/V Cosco  
20 Busan, their engines, tackle, equipment,  
appurtenances, freights, and cargo *In Rem*,

21 Defendants.  
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Case No. C-07-5800-SC

**IN ADMIRALTY**

**DECLARATION OF PLAINTIFFS'  
COUNSEL WILLIAM M. AUDET IN  
SUPPORT OF EX PARTE  
APPLICATION FOR ENTRY OF AN  
INITIAL CASE MANAGEMENT  
ORDER**

1 I, William M. Audet, declare as follows:

2 1. That I am over the age of 18, base this declaration upon personal knowledge and  
3 am otherwise competent to testify herein. I am counsel for Plaintiffs Chelsea, LLC, Mark Russo,  
4 Allen Loretz, Ivan Simpson and Class, and dozens of other potential victims of the Cosco Busan  
5 Oil Spill.

6 2. Since my firm filed the first Class Action Complaint on behalf of fishermen and  
7 others impacted by the Cosco Busan Oil Spill, my office has been actively litigating the case,  
8 including obtaining an order arresting the Vessel. Over the last few days, I have been contacted  
9 by other attorneys who indicated they intend to file similar cases in this District Court.

10 3. Based on my twenty-five years of practice, I believe that dozens of other cases  
11 will be filed in a short time frame. I believe that the Court and the parties would benefit from,  
12 *inter alia*, appointment of my firm as interim plaintiffs' liaison counsel and entry of a pretrial  
13 order relating all similar cases filed in this District to this Court.

14 4. The proposed pretrial order establishes a protocol for automatically allowing the  
15 Clerk of the Court to "relate" over any similar complaints filed in this Court. In addition, the  
16 proposed order establishes a "master docket" file for all related cases.

17 5. Among other benefits of appointing interim liaison counsel, the Court and its staff  
18 will not be required to unnecessarily expend resources providing the same information over and  
19 over regarding the status of the case to any newly filed plaintiffs. In addition, a similar case was  
20 recently filed in San Francisco Superior Court, and appointment of liaison counsel would allow  
21 for the immediate coordination of this case with the state court's case. A copy of my "CV" and  
22 firm resume is attached hereto as Exhibit "A."

23 6. Based upon the aforementioned facts, there appears to be just cause for entry of  
24 this proposed order.

25 I declare under penalty of perjury of the laws of the United States of America that the  
26 foregoing is true and correct to the best of my knowledge. Dated this 28th day of November  
27 2007.

28   
William M. Audet

**Exhibit A**

**WILLIAM M. AUDET, J.D., L.L.M.**

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William M. Audet is the founding partner of Audet & Partners, LLP, a law firm recognized for its aggressive prosecution of mass torts, class action, and individual cases involving defective pharmaceutical drugs and devices, product defect, construction defect, toxic tort, business fraud, and antitrust claims.

Mr. Audet graduated (with highest honors) and earned a J.D. from Golden Gate University School of Law in 1983. In 1987, Mr. Audet earned an L.L.M. from the University of Wisconsin School of Law, where he was a Clinical Instructor and Staff Attorney at the University of Wisconsin (Legal Assistance to Institutionalized Persons Program). In 1987, Mr. Audet served as a staff attorney at the Ninth Circuit Court of Appeals. Subsequently, Mr. Audet had the honor to serve as a Law Clerk to the Honorable Fern M. Smith (Judge of the United States District Court for the Northern District of California), and as a Law Clerk to the Honorable Alfonso J. Zirpoli (Judge of the United States District Court for the Northern District of California). After his two clerkships, Mr. Audet was employed at Lieff, Cabraser, Heimann & Bernstein, where he became a partner in 1996. In 1996, Mr. Audet joined with Richard Alexander and Amanda Hawes and formed Alexander, Hawes & Audet, LLP. In 2007 Mr. Audet founded Audet & Partners, LLP.

Mr. Audet is currently a member of the California and Wisconsin bars, and has been admitted to practice before dozens of federal and state courts throughout the United States.

Mr. Audet is a coauthor of a book on federal discovery: *Handling Federal Discovery*, Jakab, Audet & Fanady (James Publishing) (now in its 9th edition).

The partners and associates at Mr. Audet's firm have collectively filed and prosecuted hundreds of personal injury and commercial business cases. Mr. Audet has been appointed to leadership roles in dozens of class actions and mass tort cases in state and federal court, including, but not limited to: *In re Baycol Products Liability Litigation*, D. Minn., MDL No. 1431 (Executive Committee); *In re: Metabolife Products Liability Litigation*, JCCP 4360 (Executive Committee); *In re PRK/Lasik Consumer Litigation*, Santa Clara Superior Court, Master File No. CV772894 (Lead Counsel); *In re Ancure/Guidant Litigation*, N.D. Cal. (San Jose), Master File No. 09-02797-JF (Lead Counsel).

Mr. Audet has spoken at a number of conferences on issues relating to mass torts and class actions, and he has sponsored and/or served on the panel of a number of Plaintiff "attorney-only" tutorial conferences relating to Vioxx, Bextra and other defective pharmaceutical drugs and devices. Mr. Audet was recently named as the 2005 Champion of Justice by the San Francisco Bar Association (legal foundation) for his contribution to the legal community and his *pro bono* activities.

## AUDET & PARTNERS, LLP

Attorneys – at – Law

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*Audet & Partners, LLP, is a nationally recognized trial firm with offices in San Francisco and New York, and affiliated offices throughout the United States. The attorneys at Audet & Partners, LLP, have concentrated their practice on the prosecution of complex individual, mass tort and class action cases. The firm represents individuals, governmental entities, small businesses and institutional shareholders in product liability, tort, negligence, consumer, construction defect, investment fraud, securities, insider trading, antitrust, environmental, whistle blower, aviation and employment cases. In recognition of their commitment to the legal profession and outstanding abilities to get results for their clients, the firm and its members have served as Court-appointed Plaintiffs Counsel in dozens of federal and state cases throughout the United States. Below is a sampling of our cases:*

### **Product Defect and Mass Tort Litigation**

*In Zyprexa Litigation*, MDL 1596, United States District Court, Eastern District of New York. The firm represents over 300 clients who developed diabetes after ingesting Zyprexa. William M. Audet, the firm's principal partner, has been appointed a member of the Plaintiffs Executive Committee.

*In Baycol Litigation*, MDL 1431, United States District Court, Minnesota. William M. Audet serves as Court appointed member of the Plaintiffs Executive Committee relating to the defective drug Baycol.

*In re Metabolife Litigation*, JCCP 4360 (California). William M. Audet serves as a court-appointed member of the State Steering Committee.

*In Vioxx Litigation*, MDL 1657, New Jersey State Court. The firm and its affiliated counsel have filed in excess of 300 cases against Defendants Merck & Company arising out of injuries associated with the defective drug Vioxx.

*In re Bextra Litigation*, MDL No. 1699, United States District Court, Northern District of California. William M. Audet serves as a Court appointed member of the Plaintiffs Steering Committee.

*In re Intergel Litigation*, Florida State Court. William M. Audet and Susanne Scovern filed dozen of cases on behalf of women injured using a Johnson & Johnson product called Intergel. The firm and its co-counsel have recovered tens of millions of dollars for their clients in a confidential settlement with the company.

*In re Defective Ancure Products Liability Litigation*, United States District Court, Northern District of California and Santa Clara County Superior Court. The firm represents dozens of individuals who were implanted with a defective device.

*Galanti v. Goodyear Tire & Rubber Company*, No. 03-209, United States District Court, District of New Jersey. William M. Audet and Michael McShane served as Court-appointed Class Counsel with pending \$300 million settlement involving a defective radiant heating system.

*Williams v. Weyerhaeuser*, San Francisco County Superior Court, California, No. 995787, and *Chambers, et al., v. Weyerhaeuser*, King County Superior Court, Washington, No. 98-2-21084-2 KNT. The firm members served as one of three counsel in a class action involving allegations of defective siding manufactured by Weyerhaeuser.

*Roy v. Cemwood Corporation*, Contra Costa County Superior Court, California, No.: MSC99-00499. The firm serves as one of four co-lead counsel in a national class action involving allegations of defective roofing products.

*Table Bluff Reservation (Wiyot Tribe), et al., v. Philip Morris, et al.*, United States District Court for the Northern District of California, San Francisco Division, No. C 99-02621 MHP. The firm represented Native American Tribes challenging the \$200 billion plus state tobacco agreement on the grounds that it violates their civil rights.

*In re Stucco Litigation (Ruff v. Parex)* County of New Hanover, North Carolina, No. 96-CVS-0059. The firm's principal partner William M. Audet, serves on the Court-appointed Plaintiffs Steering Committee. The case was filed on behalf of homeowners who had defective synthetic stucco installed in their homes.

*"Fen-Phen" Product Liability Litigation*, MDL 1203. The firm successfully filed a medical monitoring and punitive damage claim on behalf of California residents.

*Stuart Hanlon, et al., v. Chrysler Corporation*, United States District Court, Northern District of California, No. C-95-2010 CAL. The Firm's attorneys worked on a case seeking correction of defective rear hatch door lock failures in nominal impacts for 3,300,000 owners of Chrysler minivans.

*Smith v. Hewlett-Packard*, Santa Clara County Superior Court, CV 776794. The firm serves as Plaintiffs' Liaison Counsel. Contrary to HP's representations, the Recorders could only consistently and reliably record less user data than the industry standard. When attempting to record more, error messages appeared, previously recorded data was lost and the CD became useless.

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Consumer Litigation

*Roberts v. Bausch & Lomb*, United States District Court, Northern District of Alabama, No. CV-94-C-1144-W. William M. Audet, the firm's principal partner, served on the Plaintiffs' Committee in this nationwide consumer class action. A settlement against Bausch & Lomb was approved by the Court on August 1, 1996. Under the settlement, Bausch & Lomb agreed to \$68 million in cash and products to 1.5 million buyers of the Company's disposable contact lenses.

*Hilla v. TCI Cablevision*, Santa Clara County Superior Court, No. CV-769105. The firm represented California residents involving illegal overcharges by the cable company for late fees.

*Plotkin v. General Electric*, United States District Court, Northern District of California, Action No. C-92-4447. The firm filed a class action against General Electric for defrauding the American public in the sale of Energy Choice Light Bulbs, which were claimed to be energy efficient, required less electricity and would preserve the environment. General Electric subsequently settled this national class action.

*Afanador v. H&R Block Tax Services, Inc.*, Santa Clara County Superior Court, California, No. CV-767677. The Firm's attorneys, along with other Plaintiffs' counsel, successfully represents consumers in claims against H&R Block arising out of its "Rapid Refund" program.

*Sears Automotive Center Consumer Litigation*, United States District Court, Northern District of California, No. C-92-2227. The firm filed a class action on behalf of consumers defrauded by Sears' Auto Centers. The case was successfully concluded in August 1992. William M. Audet was appointed to the Plaintiffs' Steering Committee.

*Chamberlain v. Flashcom*, Orange County Superior Court, Case No. 00 CC 04212. In this class action, William M. Audet, principal partner, along with other counsel successfully a remedy against Defendant's unlawful, unfair, and fraudulent business conduct.

*Providian Credit Card Cases*, San Francisco County Superior Court, JCCP No. 4085. Through television commercials, direct mail and the internet, the Providian Defendants purported to facilitate the issuance of credit cards to people with damaged credit histories. William M. Audet served as Class Counsel.

*In re Google Litigation*, Northern District of California, San Jose Division. The firm members represent advertisers on Google's web pages who claim to have been overcharged for advertising through a complicated monthly charge program.



*In re Kia Litigation*, Orange County Superior Court. William M. Audet served as class counsel in a number of jurisdictions in a case involving claims by Kia regarding its automotive products. The case was settled with a significant monetary and non-monetary recovery for the class.

*Insurance/Healthcare Litigation*

*In re Unum Provident Litigation*, United States District Court, Eastern District of Tennessee, MDL No. 1552. William M. Audet and Michael McShane serve as Court-appointed Lead Counsel in a pending class action on behalf of Plaintiffs alleging the wrongful denial of benefits under long term disability policies.

*In re Industrial Life Insurance Litigation*, United States District Court, Eastern District of Louisiana., MDL Nos. 1371, 1382, 1390, 1391, and 1395. William M. Audet of the firm serves on the Court-appointed Plaintiffs' Steering Committee. The class cases involve claims that insurance companies overcharge African-Americans for life and health insurance.

*In re Life of Georgia Insurance Litigation*, Thirteenth Judicial District, Shelby County, Memphis, Tennessee. Reached nationwide class settlement in 2002 on behalf of class of insureds discriminated against in the issuance of life insurance. William M. Audet was Lead Counsel.

*Thorn v. Jefferson Pilot Insurance Co.*, United States District Court, South Carolina. Nationwide class on behalf of purchasers of life insurance. Michael McShane of the firm represents the proposed Plaintiffs class alleging racial discrimination in the issuance of life insurance policies

*In re Average Wholesale Price Litigation*, MDL Docket No. 1456. William M. Audet and Michael McShane of the firm serve as Court appointed members of the Executive Committee, representing Plaintiffs in a nation-wide class action allegedly the manipulation of pricing for prescription drugs.

*In re Tenet Healthcare Litigation*, Los Angeles County, Superior Court, California. Numerous actions coordinated in 2002 by the Judicial Council. William M. Audet of the firm is one of three Court appointed lead counsel on behalf of nationwide class of individuals who were allegedly overcharged directly, or through their health insurance for medical services, products and medication.

*Lawson, et al., v. Liberty Life*, Birmingham, Alabama, No. 96-1119. William M. Audet of the firm, along with four other Plaintiffs' Counsel, represents a proposed class of life insurance policy holders of Liberty Life Corporation who were subjected to unlawful life insurance policy "churning" by Liberty Life.



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Antitrust

*In re PRK/Lasik, Laser Surgery Overcharges Litigation*, Santa Clara County Superior Court, California, Master File No. CV772894. William M. Audet and Joseph Russell served as Court-appointed Liaison Counsel in a nationwide class action case alleging antitrust violations against Visx, Inc. And Summit, Inc.

*Flat Glass Antitrust Litigation*, United States District Court, Western District of Pennsylvania, MDL No. 1200 (and related cases). Mr. Audet of the firm serves as one of five Court-appointed Discovery Committee members and as Plaintiffs' Counsel in a national class action antitrust case pending against the manufacturers of flat glass.

*Toys "R" Us Antitrust Litigation*, United States District, Northern District of California, No. C-97-3931-TEM. The firm filed a national class action antitrust complaint on behalf of toy consumers.

*Los Angeles Milk Antitrust Litigation*, Los Angeles County Superior Court, California, No. BC 070661. William M Audet and other members of the firm, along with other Plaintiffs' Counsel, represents consumers arising out of claims of antitrust violations against Los Angeles supermarkets due to alleged price fixing of milk.

*California Indirect Purchaser Auction House Cases*, San Francisco County Superior Court, No. 310313. In this case against Christie's, Sotheby's and others, Defendants are charged with conspiring to fix commissions for the sale at auction of art and other items in California.

*Pharmaceutical Antitrust Cases*, San Francisco County Superior Court, California, Judicial Council Coordination Proceeding, No. 2969. The firm members worked on a case for independent pharmacies pursuing claims against major drug manufacturers for violation of California's price fixing statutes.

*In re Vitamin Antitrust Litigation*, California, North Carolina, Tennessee and Maine. William M. Audet serves as lead counsel in three states and on the Plaintiffs' Executive Committee in one state in claims involving alleged price fixing by the manufacturers of vitamin products.

*In re Methionine Antitrust Litigation*, MDL Docket No. 1311. William M. Audet serves as class counsel in a case involving allegations of price fixing in the Methionine industry.

*In re Bromine Antitrust Litigation*, Docket No. 1310. The firm serves as class counsel in a case involving allegations of antitrust violations in the Bromine industry.

*In re Carbon Fiber Antitrust Litigation*, C.D. Cal., C 99-11475 RJK. Manufacturers, sellers, and distributors of carbon fibers were sued by makers of airplanes, spacecraft parts, industrial and sporting equipment for conspiring to maintain an artificially inflated price for their product. The firm members served as one of Plaintiffs' counsel.

*In re: Terazosin Hydrochloride Antitrust Litigation*, S.D.Fla. MDL 1317. In this lawsuit Plaintiffs allege a conspiracy to create a monopoly and fix prices of this widely used prescription drug as well as preventing the sale of any generic bioequivalent to Hytrin. The firm members served as one of Plaintiffs' counsel.

*In re Dram Antitrust*, MDL 1486, Northern District of California. William M. Audet of the firm serves as class counsel in a class action case to recover money for class members due to antitrust activity in the DRAM industry.

*In re Copper Tubings Litigation*, United States District Court, District of Tennessee. William M. Audet of the firm was appointed as Co-lead Class Counsel in a case involving an alleged worldwide conspiracy to overcharge customers in the copper tubing industry.

#### Securities & Insider-Trading

*In re CNET Derivative Litigation*, William M. Audet and Michael McShane of the firm filed a case against the corporate Defendants for insider trading and back dating of options. The case is pending in San Francisco Superior Court, California.

*Adaptec Derivative Litigation*, Santa Clara County Superior Court, California, Master File No. CV 772590. The firm serves as Liaison Counsel in a derivative action filed on behalf of shareholders of Adaptec, Inc.

*In re Genesis Securities Litigation*, Northern District Court of California. William M. Audet serves as class counsel on a case filed against Genesis. After the case was dismissed by the District Court, the firm filed an appeal and ultimately settled the case for \$1.5 million.

*Informix Derivative Securities Litigation*, San Mateo Superior Court, California, Case No. 402254. The firm served as one of the Plaintiffs' Derivative Counsel in a shareholder lawsuit alleging derivative claims on behalf of Informix.

*Solv-Ex Securities Litigation*, Second Judicial District Court, County of Bernalillo, New Mexico, No. CV-96-09869. The firm serves as Plaintiffs' Class Counsel in a suit alleging securities fraud against Solv-Ex Corporation and other insider defendants.

*Imp, Inc., Securities Litigation*, Santa Clara County Superior Court, California, No. CV762109. The firm represents shareholders of Imp, Inc. in an action against certain insiders of Imp, Inc., for alleged insider trading of the Company's stock.

*CBT Group Derivative Litigation*, San Mateo County Superior Court, California, No. 406767. The Firm's founder, William M. Audet served as one of two plaintiffs' counsel representing shareholders of CBT Group, PLC, in a derivative action against officers and directors of the Company.

*Oakley Technology Derivative Litigation*, Santa Clara County Superior Court, California, No. CV75829. The Firm's members served as one of three Co-lead Counsel in a derivative securities case brought on behalf of shareholders of Oakley Technology, Inc., brought against certain Officers and Directors of the Company.

*Horizon Securities Litigation*, United States District Court for New Mexico, No. 96-0442 BB/LCS. William M. Audet of the firm serves as one of the Plaintiffs' Class Counsel in a securities case filed against New Mexico-based Horizon Corporation for alleged violation of federal securities laws.

*Bay Networks Securities Litigation* (*Garnier v. Bay Networks*, CV764357; *Greeneway v. Bay Networks*, CV765564), Santa Clara County Superior Court, California. The firm members served as one of four-plaintiffs' counsel representing shareholders of Bay Networks for alleged securities violations.

*Unison Healthcare Corporation Litigation*, United States District Court of Arizona, Case No. Civ. 97-0583-PHX. The firm members served as one of the Plaintiffs' Class Counsel representing investors in Unison Healthcare.

*S3 Derivative Litigation*, Santa Clara County Superior Court, California, No. CV770254. The firm members served as one of the Plaintiffs' Lead Counsel in a derivative action filed on behalf of shareholders of S-3, Inc.

*In re Networks Associates Derivative Litigation*, Santa Clara County Superior Court, Consolidated Case No. CV-781854. In this case, shareholders sued officers and directors of this leading manufacturer of anti-virus and protocol analyzer software who sold over 800,000 shares of their personal stock for more than \$33 million by misleading the public regarding its value. William M. Audet of the firm served as Liaison Counsel.

*In re Oak Technology Derivative Action*, Santa Clara County Superior Court, No. CV758629. Shareholders sued directors and officers to recover more than \$100 million Defendants made by artificially inflating the company's stock, representing that exceptional demand for the company's products existed. In fact, the company's shipments of CD-ROM controllers far exceeded what the market

could absorb. Three related derivative cases were filed and subsequently consolidated. William M. Audet of the firm serves as Lead Counsel in this lawsuit.

*In re Sybase Derivative Litigation*, N.D.Cal., No. C-98-0252-CAL. The Firm's members served as Plaintiffs' Counsel in this stockholder's derivative action brought on behalf of Sybase against certain of the Company's present and former officers and/or directors for insider trading. Founded in 1984, Sybase makes computer database management systems. Clients include financial service, telecommunication, energy, government, retail, manufacturing, media, entertainment and healthcare providers.

**About the Attorneys at the Firm**

**William M. Audet** earned a B.A. from the University of California at Davis in 1981, a Juris Doctor from Golden Gate University School of Law in 1984, where he was the Editor of the Golden Gate University Law Review. He completed his formal legal education with a Masters of Law from the University of Wisconsin School of Law in 1987. After clerking for the Ninth Circuit Court of Appeals, Mr. Audet clerked for The Honorable Alfonso J. Zirpoli, United States District Judge for the Northern District of California and The Honorable Fern M. Smith, United States District Judge for the Northern District of California. While obtaining his Masters Degree in Law at the University of Wisconsin, Mr. Audet was also a clinical instructor at the faculty of the University of Wisconsin School of Law. Mr. Audet's practice focuses on complex litigation, including class and non-class action claims involving mass torts, product liability, antitrust and consumer class actions. Mr. Audet is a frequent speaker on a variety of topics and is a co-author of *Handling Federal Discovery* (9<sup>th</sup> Ed.)(James Publishing Company). In 2005, Mr. Audet was awarded the Justice Award from the San Francisco Bar Foundations for his financial contribution to the legal community and for his firm's pro bono work over the years. Over the years, Mr. Audet has been appointed to leadership positions in a number of important and groundbreaking cases.

**Michael McShane** earned his B.A. in Philosophy from the University of California at Santa Barbara, before earning his law degree from the University of Oregon in 1986, where he was the Articles Editor for the Journal of Environmental Law and Litigation. Since his admission to the California Bar, Mr. McShane's practice has been devoted exclusively to prosecuting complex class action litigation throughout the United States. His areas of practice include products liability, consumer claims, antitrust litigation, insurance fraud and medical/pharmaceutical overcharge cases.

**Joseph E. Russell** earned a B.S. in mathematics from Fresno State College in 1963. Mr. Russell earned his J.D. in 1969. During his law school, Mr. Russell was appointed Editor of Golden Gate's law review, Cal Law, Trends & Developments, and received the San Francisco Bar Association's award as Bay Area Scholar of the Year. In 1970, he received a Masters of Law from Southern Methodist University School of Law. Mr. Russell has tried dozens of cases, focusing on cases involving technical and scientific matters, including anti-trust, unfair business competition,

construction and aviation cases. He is a member of the Association of Trial Lawyers of America and Consumer Attorneys of California. Mr. Russell serves as senior Trial Counsel at the firm.

**Susanne N. Scovern**, received a B.A. with highest honors and distinction in Russian/East European Studies and Political Philosophy from the University of Michigan in 1985. In 1990, Ms. Scovern was awarded a Juris Doctorate from the University of Iowa where she was a member of the *University of Iowa Law Review*. Over the years, she has practiced a broad range of product liability, mass tort, class action, employment and commercial litigation. Ms. Scovern is a member of the American Bar Association, the California Bar Association and the San Francisco Bar Association. She is active in the Science & Technology and Labor and Employment Sections of the ABA and State Bar. She is also a member of the Association of Trial Lawyers of America and the San Francisco Trial Lawyers Association. She is admitted to practice in California and the District of Columbia. Ms. Scovern focuses her work at the firm on defective medical devices and drugs, and is currently heavily involved in the prosecution of the Firm's Vioxx cases.

**Kevin L. Thomason** earned a B.A. in Interdisciplinary Studies from California State University at Dominguez Hill in 1991 and a Juris Doctor from the University of California, Hastings College of the Law in 1994. Kevin has extensive experience in internet and computer technology and has taught MCLE classes on the internet throughout California. He has written extensively for the legal press on these topics. His practice focuses on complex litigation and class actions. Kevin also handles the firm's internet marketing.

**Joshua C. Ezrin** received a B.A. with honors in Sociology from the University of California at Santa Cruz in 1995, and a Juris Doctor from the University of San Francisco School of Law in 2001. Mr. Ezrin has focused his practice on complex litigation and toxic torts and is currently working on a number of cases, including the Bextra, Vioxx and Zyprexa pharmaceutical litigation for the firm.

**Adel Nadji** earned a B.A. in English from the University of California at Berkeley in 1999, and a Juris Doctor from the University of San Francisco School of Law in 2004. While in law school, he was a member of the *Maritime Law Journal*, and the Vice President of the Public Interest Law Foundation. Mr. Nadji published an article titled, *A Decade in the Development of NAFTA Chapter 11*, in the USF Graduate Business Journal. Mr. Nadji is currently focusing his work at the firm on the Zyprexa and Vioxx litigation.

**Saviz Sebghati** attended the University of California at Berkeley from 1979 through 1983, graduating with a B.A. in economics before earning his Jurisprudence Doctorate from Boston University School of Law in 1986. Saviz has over fifteen years experience in litigation and general corporate law, including securities, banking, and real estate. Saviz has represented manufacturers, institutions, internet providers as well as organizations providing entertainment. Saviz holds membership on several State Bar of California committees: Business Law, Intellectual Property Law, International Law, Labor and Employment, Law Practice Management and Technology, Litigation and Real Property Law. (Of Counsel)